

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Ashton, et al. v. al Qaeda Islamic Army, et al., 02-CV-6977 (GBD)(FM)

NOTICE OF MOTION TO VACATE DEFAULT JUDGMENTS

For the reasons set forth in the declaration of Andrew J. Maloney, attached hereto, the *Ashton* plaintiffs, by and through counsel, Kreindler & Kreindler LLP, respectfully move this Court to amend its October 31, 2016 Order and vacate the final judgments of solatium damages awards for Anthony Porrazzi and Antionette Tammome under F.R.C.P. Rule 60.

Dated: New York, New York
January 30, 2017

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ Andrew J. Maloney, III
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of PLAINTIFFS' NOTICE OF NOTICE OF MOTION TO VACATE DEFAULT JUDGMENTS was filed electronically this 30th day of January 2017. Notice of this filing will be served upon all parties in 03-MDL-1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system, which all parties may access.

/s/ Andrew J. Maloney, III
Andrew J. Maloney, Esq.